

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FOCUS PRODUCTS GROUP  
INTERNATIONAL, LLC, ZAHNER DESIGN  
GROUP, LTD., AND HOOKLESS SYSTEMS  
OF NORTH AMERICA, INC., SF HOME  
DÉCOR, LLC, SURE FIT HOME DÉCOR  
HOLDINGS CORP., and SURE FIT HOME  
PRODUCTS, LLC,

Plaintiffs,

v.

KARTRI SALES COMPANY, INC. AND  
MARQUIS MILLS, INTERNATIONAL, INC.

Defendants.

Civil Action No.:

1:15-cv-10154 (PAE)(SDA)

(JURY TRIAL DEMANDED)

**PLAINTIFFS' PROPOSED VOIR DIRE QUESTIONS**

Plaintiffs Focus Products Group International, LLC, SF Home Décor, LLC, Sure Fit Home Décor Holdings Corp., and Sure Fit Home Products, LLC (collectively, "Focus"), Zahner Design Group, Ltd. ("ZDG"), and Hookless Systems of North America, Inc. (HSNA) (collectively all "Plaintiffs") hereby respectfully propose the following questions for voir dire of potential jurors in this matter:

1. Have you or anyone you know ever invented something?
2. What did you or that person invent?
3. Did you or they make money from the invention?
4. Have you or anyone you know ever had any experiences with the United States Patent and Trademark Office?
5. If so, can you explain the experience?

6. Have you, or anyone you know ever designed anything?
7. What did you or they design?
8. Has anyone ever knocked off any of those inventions or designs?
9. If so, explain what happened.
10. Has anyone bought so-called designer products on the street rather than purchasing them in a store?
11. What is your highest level of education?
12. What is your occupation?
13. Are any of you artists?
14. Has anyone here started their own business? What type?
15. Has anyone ever sued another person or party in Court? If so, for what?
16. Has anyone here ever been sued by another person? If so, for what?
17. What are your hobbies?
18. If someone created a new drink and wanted to make it look just like the classic Coca-Cola bottle, do you think that would be a good or bad idea, and why?
19. Are you a detail kind of person?
20. When you go to the supermarket, do you buy brand names or the generics?
21. Anyone a cook?
22. If so, do you closely follow the recipes for each dish or wing it?
23. What are some of your favorite TV programs?
24. What are your favorite magazines?
25. How do you get your news?
26. If you get it through TV, which channels do you watch?

27. If you get it online, what news sites do you follow?
28. Which printed newspapers do you read (if any)?

Dated: April 15, 2021

*/s/ Lee A. Goldberg*

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Morris E. Cohen  
Lee A. Goldberg  
Limor Wigder  
GOLDBERG COHEN LLP  
1350 Avenue of the Americas, 3<sup>rd</sup> Floor  
New York, NY 10019  
646-380-2087 (telephone)  
646-514-2123 (facsimile)  
mcohen@goldbergcohen.com  
lgoldberg@goldbergcohen.com  
lwigder@goldbergcohen.com

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document is being served electronically on April 15, 2021 via the Court's CM-ECF system on counsel of record for Defendants.

Dated: April 15, 2021

*/s/ Morris E. Cohen*

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Morris E. Cohen